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July 3, 2025

**VIA ECF**

Honorable Robyn F. Tarnofsky  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Burns, et al., v. the City of New York, et al.,  
25 Civ. 01999 (GHW) (RFT)

Your Honor:

I am one of the attorneys in the Special Federal Litigation Division of the New York City Law Department representing Defendants the City of New York ("City"), former Mayor Bill De Blasio, former New York City Police Department Commissioner Dermot Shea, and former New York City Police Department Chief of Department Terence Monahan (hereinafter "Defendants") in the above-referenced matter. Defendants write to respectfully request that Plaintiffs be permitted to file a Second Amended Complaint by July 23, 2025, and that Defendants' response thereto be due on August 22, 2025.

By way of relevant background, on March 10, 2025, Plaintiffs filed the Complaint. See ECF No. 1. On March 13, 2025, Plaintiffs filed the First Amended Complaint and claim, *inter alia*, that they were falsely arrested between May 28, 2020 and November 5, 2020 in various locations in New York City. See ECF No. 11. On April 2, 2025, Defendants requested their first extension of time to respond to the First Amended Complaint, as additional time was required to investigate Plaintiffs' allegations. See ECF No. 16. On April 3, 2025, the Court granted this request. See ECF No. 17. On May 29, 2025, Defendants requested an additional extension of time to respond to the First Amended Complaint to July 3, 2025. See ECF No. 18. The Court granted this request. See ECF No. 19.

Pursuant to Your Honor's Individual Rules, the parties met and conferred on June 30, 2025, regarding Defendants' prospective motion to dismiss the First Amended Complaint. During the meet and confer, Plaintiffs stated they wish to amend the pleadings prior to motion practice and requested 21 days from today until July 23, 2025 to do so. In addition, during the meet and confer, it was discussed that Defendants will be sharing certain documents with Plaintiffs to facilitate the drafting of the amended pleading, to which the requested document was shared with Plaintiffs on July 1, 2025.

Accordingly, Defendants respectfully request that Plaintiffs be permitted to file the Second Amended Complaint by July 23, 2025, and Defendants' response be due by August 22, 2025.

Thank you for your time and consideration.

Respectfully submitted,

/s/ *Zoe Reszytniak*

Zoe Reszytniak  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

CC: VIA ECF  
Counsel of Record